

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
Old LC, Inc. <i>et al.</i> ,	Case No. 19-11791 (BLS)
Debtors.	
Official Committee of Unsecured Creditors of Old LC, Inc., <i>et al.</i> , for and on behalf of the estates of Old LC, Inc., <i>et al.</i> ,	
<i>Plaintiff,</i>	
v.	Adv. No. 20-51002 (BLS)
Upfront V, LP, Breakwater Credit Opportunities Fund, L.P., <i>et al.</i> ,	
<i>Defendants.</i>	

**NOTICE OF DEPOSITION OF STUART KAUFMAN**

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c/o  
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PLEASE TAKE NOTICE that pursuant to Federal Rules of Bankruptcy Procedure 7030 and 9016, and Federal Rule of Civil Procedure 45(a)(4), Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski (together, the “Breakwater Defendants”) hereby notify all parties to this action and their counsel of record of Breakwater Defendants’ intention to take the oral deposition of Stuart Kaufman, former Chief Restructuring Officer of the Debtors.

This deposition will take place by Zoom video conference on September 21, 2021, at 10:30 a.m. eastern, and continue thereafter from hour to hour and day to day until completed. This deposition will be conducted pursuant to, and in accordance with, the Federal Rules of Civil Procedure before a certified court reporter. This deposition will be recorded stenographically and will be videotaped.

Dated: August 11, 2021  
Wilmington, Delaware

**MORGAN, LEWIS & BOCKIUS LLP**

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*Attorneys for Defendants Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski*